

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Patricia Townes Debtor(s)	Chapter 13 Proceeding No. 24-10682 PMM
Citizens Bank, N.A. Objectant(s)	
v.	
Patricia Townes Respondent(s)	

OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A., a secured creditor in this case objects to the Plan and to the confirmation of the debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on February 29, 2024, Citizens Bank, N.A. is the holder of a secured claim in the amount of \$86,151.28 against the Debtor's property located at 2216 Mifflin St., Philadelphia, PA 19145. On that date the arrears due Citizens Bank, N.A. were \$9,876.14. A Proof of Claim was filed by Citizens Bank, N.A. on or about March 26, 2024. See Exhibit "A" attached hereto and made a part hereof.
3. Debtor's Plan makes no provision for the payment of Citizens Bank, N.A.'s arrears claim.

4. If the Plan is confirmed the Citizens Bank, N.A. will suffer irreparable injury, loss and damage.

Respectfully submitted,

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